

Exhibit 4

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION OPIATE
LITIGATION

This document relates to:
Track One Cases

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

DECLARATION OF DAVID MYERS

I, David Myers, declare as follows:

1. I am Associate Director of Marketing for Teva Pharmaceuticals USA, Inc. I have held this position since December 2018. Prior to this position, I was the Senior Manager for Product Marketing at Teva Pharmaceuticals USA, Inc. Prior to joining Teva Pharmaceuticals USA, Inc., I held the roles of Manager and Senior Manager for the Products and Communications Group at Actavis since January 2002.

2. I have personal knowledge of the facts set forth herein or have acquired such knowledge from my review of documents and conversations with relevant employees for Watson Laboratories, Inc. (“Watson Labs”), Actavis LLC (“Actavis LLC”), Actavis Pharma, Inc. (“Actavis Pharma”), and other affiliated companies.¹ Collectively, these entities are referred to

¹ Actavis Pharma, Actavis LLC, Watson, Warner Chilcott Company, LLC, Actavis South Atlantic LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC, Actavis Totowa LLC, Actavis Kadian LLC, Actavis Laboratories UT, Inc. f/k/a Watson Laboratories, Inc.-Salt Lake City, and Actavis Laboratories FL, Inc., f/k/a Watson Laboratories, Inc.-Florida.

as the “Actavis Generic Entities.” I could and would competently testify to the facts stated herein if called to do so.

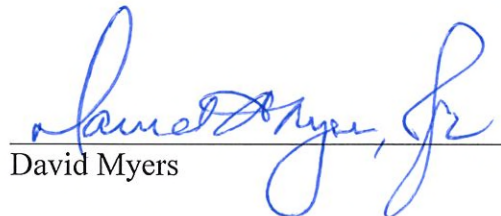
3. Teva Pharmaceuticals USA, Inc. first became affiliated with the Actavis Generic Entities in August 2016.

4. The Actavis Generic Defendants, including Watson Labs, Actavis LLC, and Actavis Pharma, sell only generic medicines, including only generic opioid medicines, to distributors and other customers. The Actavis Generic Defendants have never promoted the safety, efficacy, or therapeutic value of their generic opioid medicines, including in Ohio. As a general matter, the Actavis Generic Defendants have never used continuing medical education (“CME”), speaker programs, or other third parties to promote their generic opioids.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 25, 2019

By:


David Myers